

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

V.

VLADISLAV KLYUSHIN
Defendant

CRIMINAL NO. 21-cr-10104-PBS

**ASSENTED-TO MOTION FOR LEAVE TO FILE OVERLONG MOTION TO REVOKE
PRETRIAL DETENTION ORDER**

Now comes the Defendant Vladislav Klyushin, by and through undersigned counsel, and hereby respectfully requests leave to file his 27-page Motion to Revoke Pretrial Detention Order. As grounds and reasons therefore, the defense states that the additional pages are necessary to factually and legally address the issues leading to the Magistrate Judge's Detention Order.

WHEREFORE, the defense respectfully requests this Honorable Court to grant its request.

COMPLIANCE WITH LOCAL RULE 7.1(a)(2)

The undersigned counsel has conferred with the Government, who by and through AUSA Seth Kosta, assent to the request to file an overlong brief, but not the request to revoke the pretrial detention order.

Respectfully Submitted,
Vladislav Klyushin,
By His Attorney,

/s/ Maksim Nemtsev
Maksim Nemtsev, Esq.
Mass. Bar No. 690826
20 Park Plaza, Suite 1000
Boston, MA 02116
(617) 227-3700
menemtsev@gmail.com

Dated: April 4, 2022

CERTIFICATE OF SERVICE

I, Maksim Nemtsev, hereby certify that on this date, April 4, 2022, a copy of the foregoing documents has been served via Electronic Court Filing system on all registered participants.

/s/ Maksim Nemtsev
Maksim Nemtsev, Esq.